

**IN THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR MANATEE COUNTY, FLORIDA  
CIVIL DIVISION**

MARY LOU SMITH  
an individual, and  
SHARON DENSON,  
an individual

Plaintiffs,

vs.

CASE NO.: 08 CA 11315  
Division: B

TRAILER ESTATES PARK AND  
RECREATION DISTRICT,  
an independent special taxing district,  
JANET JONES, an individual,  
JOHN VANDERMOLEN, an individual,  
JOSEPH SALERNO, an individual, and  
MARY LOU MCNULTY, an individual

Defendants.

---

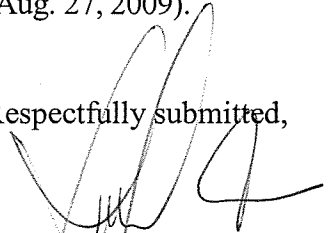
**NOTICE OF FILING PARTIAL DEPOSITION TRANSCRIPTS IN SUPPORT OF  
PLAINTIFFS' MOTION TO COMPEL AND MOTION FOR RULING ON  
OBJECTIONS TO NON-PARTY SUBPOENAS**

Plaintiffs, MARY LOU SMITH and SHARON DENSON, by and through their undersigned counsel, file the following partial deposition transcripts in support of Plaintiffs' Motion to Compel and Motion for Ruling on Objections to Non-Party Subpoenas and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida Law.

1. Trailer Estates Park & Recreation District Representative, Martha Brauer, Pgs. 196-199; 248-253; 327; and 341-343 (Aug. 28, 2009).
2. Witness, Pamela Cole, Pgs. 29-31; 34; Exhibit 3; and Exhibit 4 (May 19, 2009).
3. Defendant, Mary Lou McNulty, Pgs. 8; 129-131; and 134 (Aug. 12, 2009).
4. Witness, Thelma Joe Miller, Pgs. 7-10; 13-14; 46-48; and 62-64 (Apr. 17, 2009).
5. Witness, Gail Opper, Pgs. 201-202; 205-206; 209-210; and Exhibit 15 (Dec. 1, 2009).

6. Defendant, John Vandermolen, Pgs. 158-160 and 163 (Apr. 16, 2009).
7. Plaintiff, Mary Lou Smith, Pgs. 70-70 (Aug. 27, 2009).

Respectfully submitted,



---

KEVIN S. HENNESSY, ESQUIRE  
Florida Bar No. 0602558  
MAGGIE D. MOONEY-PORTALE, ESQUIRE  
Florida Bar No. 0555924  
JENNIFER R. COWAN  
Florida Bar No. 0038081  
Lewis, Longman & Walker, P.A.  
1001 3<sup>rd</sup> Avenue West, Suite 670  
Bradenton, Florida 34205  
Telephone: (941) 708-4040  
Facsimile: (941) 708-4024  
**Counsel for Plaintiffs**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to **Hunter Carroll, Esquire**, Matthews, Eastmoore, Hardy, Crauwels & Garcia, P.A., 1777 Main Street, Suite 500, Sarasota, FL 34236, **James D. Dye, Esquire**, Dye, Deitrich, Petruff, & St. Paul, 1111 Third Ave. West, Suite 300, Bradenton, FL 34205, **Robert E. Turffs, Esquire**, 1444 First Street, Suite B, Sarasota, FL 34236, **Daniel E. Scott, Esquire**, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, FL 34237, **Thomas D. Shults, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *U.S. Mail*, this 29<sup>th</sup> day of January, 2010.



---

JENNIFER R. COWAN, ESQUIRE